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COMPANY

INTEROFFICE MEMORANDUM

DATE: November 15, 1999

TO: V. Pizzuto, K-H, Bldg 111, X3469

FROM: S. M. Nesta, K-H/ESS, T130C, X6386 *S. M. Nesta*

SUBJECT: NEPA DETERMINATION FOR BLDG 771 SECURITY ZONE PROJECT-SMN-150-99

JUL 2013
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I have reviewed the project to construct and operate a Security Zone at Bldg 771. I understand that the project includes the installation of a temporary guard shack, and 1,200 feet of temporary fencing around the Bldg 790 and Bldg 771 trailer complex. The project also includes the reestablishment of fencing around the Bldg 771/774 complex, and repairs to the walkway along 6th Street.

The following environmental compliance issues are noted for this project.

The project summary indicates that surface water drainages may be modified by this project in the vicinity of two separate IHSSs. If sampling results indicate soil that is going to be excavated is located within the IHSSs, and is contaminated above acceptable soil action levels, then two actions should occur:

- 1) a berm or diversion should be installed to prevent surface water from reaching the area of exposed contaminated soil, and
- 2) while awaiting treatment, the exposed contaminated soil should have a berm placed on the downhill side (or be placed in a container), to prevent water from running off the contaminated soil and into Site drainages.

This concern results from the possibility of plutonium contamination from IHSS 143, and sodium hydroxide and potassium hydroxide from IHSS 139.1. Questions regarding these comments should be directed to Ian Paton at x2680.

All construction waters within the excavation (i.e., from stormwater or groundwater infiltration) should be collected and managed in accordance with the *Control and Disposition of Incidental Waters* procedure (1-C91-EPR-SW.01). The Surface Water contact for this program is Sue Barker (x3114). Portable pumps for de-watering the excavation, and poly tanks for temporary containment of the water, can be obtained by contacting Russ Cirillo (x5876). An alternative approach would be to transport and treat all water collected in the excavations at the Consolidated Water Treatment Facility (Bldg 891) without waiting to analyze the water quality.

Where non-contaminated soil is exposed from excavation, berms to capture the runoff are not necessary, but downstream water quality protective measures should still be implemented. These typically include silt fencing for broad expanses of disturbed soil, or hay bales installed around storm drain inlets when installation of a silt fence is not practicable.

- SAFE AND COMPLIANT CLOSURE -

B771-A-000190

Surface water runoff from the project area flows to station SW093 (the RFCA Point of Evaluation station located in the North Walnut Creek drainage). Since the checklist indicates that drainage areas may be modified, the changes may impact RFCA surface water monitoring station SW093. A walkdown with surface water personnel may be necessary, so that the drainage modifications can be implemented in a manner that allows for future surface water monitoring as the Bldg 771 D&D progresses. The point-of-contact for this issue is Ian Paton (x2680).

No other environmental compliance issues are noted for this project.

With regard to the NEPA documentation for the project, I recommend that the project be categorically excluded from further NEPA documentation requirements, pending resolution of the aforementioned issues. Attached is a copy of the draft Categorical Exclusion (CX) Determination for the project. Please review the project description portion of the draft CX Determination for accuracy and completeness. Pending any changes you request, this document should be transmitted to RFFO's NEPA Compliance Officer (John Morris) with a request for a final NEPA determination on the project. To maintain tracking of NEPA projects, please copy me on your transmittal to RFFO, at which time we will forward an electronic copy of the CX to Mr. Morris for his use. To assist you in properly transmitting the document, a sample transmittal letter from you to the RFFO NEPA Compliance Officer is attached.

If changes arise that alter the scope of the project, please contact me so that we can review the changes for NEPA compliance. Please do not hesitate to contact me at X6386 if you have any questions or need additional information.

cc:

Karan North, K-H
Ted Hopkins, RMRS
Sue Barker, RMRS
Ian Paton, RMRS
Russ Cirillo, RMRS
File

Attachments:

As Stated

<DATE>

99-RF-XXXX

J. Morris, NEPA Compliance Officer
DOE, RFFO

NATIONAL ENVIRONMENTAL POLICY ACT (NEPA) DOCUMENTATION FOR
[PROJECT NAME] - YYY-XXX-99

Attached is a draft categorical exclusion for the subject project. Kaiser-Hill NEPA staff recommend that this project be categorically excluded from further NEPA documentation requirements. A draft Categorical Exclusion Determination is included for your review and an electronic copy of the draft Determination has been made available to you.

Please provide a final NEPA determination for this project at your earliest convenience. If you have any questions or need additional information, please contact [PROJECT CONTACT AND EXTENSION].

SAMPLE

Name, Director
Division

XXX:xxx

Orig. and 1 cc - J. Morris

Attachments:
As Stated (1).

cc:
S. M. Nesta, K-H

DOE NEPA REGULATIONS SUBPART D
CATEGORICAL EXCLUSION (CX) DETERMINATION - RFFO/CX00-99

Proposed Action: Building 771 Security Zone

Location: Rocky Flats Environmental Technology Site, Golden, CO

Proposed by: U.S. Department of Energy Rocky Flats Field Office (DOE, RFFO)

Description of the Proposed Action:

The Rocky Flats Field Office (RFFO) proposes to construct and operate a new Security Zone at Bldg 771. Personnel will not need to be escorted in this area until entering the Bldg 771 Limited Access Area. This project includes the installation of a 10' X 12' temporary, skid-mounted guard shack, and 1,200 feet of temporary fencing around Building 790 and the Building 771 Trailer complex. The project also includes the reestablishment of fencing around the Building 771/774 complex, and repairs to the walkway along 6th Street.

Categorical Exclusion to be Applied:

B1.15 Siting, construction (or modification), and operation of support buildings and support structures (including, but not limited to, trailers and prefabricated buildings) within or contiguous to an already developed area (where active utilities and currently used roads are readily accessible). Covered support buildings and structures include those for office purposes: parking; cafeteria services; education and training; visitor reception; computer and data processing services; employee health services or recreation activities; routine maintenance activities; storage of supplies and equipment for administrative services and routine maintenance activities; security (including security posts); fire protection; and similar support purposes, but excluding facilities for waste storage activities, except as provided in other parts of 10 CFR 1021, Subpart D, Appendix B.

Justification:

The proposed action is the same as the activities described by B1.15; that is, the project is for the construction and operation of a security post and support structures. The facility will be located within a developed area that has active utilities and developed roads.

In accordance with 10 CFR 1021.410(b), the project (a) fits within the class of actions listed in Subpart D, Appendix B of 10 CFR 1021, (b) exhibits no extraordinary circumstances that may affect the significance of its environmental effects, and (c) is not "connected" (per 40 CFR 1508.25[a][1]) to other actions with potentially significant impacts, is not related to other proposed actions with cumulatively significant impacts (per 40 CFR 1508.25[a][2]), and is not precluded by 40 CFR 1506.1 or 10 CFR 1021.211.

Further, in accordance with 10 CFR 1021, Subpart D, Appendix B, the project would not (1) threaten a violation of applicable statutory, regulatory, or permit requirements for environment, safety, and health, including requirements of DOE and/or Executive Orders, (2) require siting and construction or major expansion of waste storage, disposal, recovery, or treatment facilities (including incinerators), (3) disturb hazardous substances, pollutants, contaminants, or CERCLA-excluded petroleum and natural gas products that preexist in the environment such that there would be uncontrolled or unpermitted releases; or (4) adversely affect environmentally sensitive resources.

I have determined that the proposed action meets the requirements for a categorical exclusion as defined in Subpart D of 10 CFR 1021. Therefore, I approve the categorical exclusion of the proposed action from further NEPA review and documentation.

Date: _____

Signature: _____

RFFO NEPA Compliance Officer